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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues Against:

Case No. *2009 - 179*

12 SHARON BRIGHT  
186 Old Hickory Road  
13 New Castle, PA

**STATEMENT OF ISSUES**

14 Respondent

15  
16 Complainant alleges:

17 PARTIES

18 1. Ruth Ann Terry, M.P.H, R.N. (Complainant) brings this Statement of  
19 Issues solely in her official capacity as the Executive Officer of the Board of Registered Nursing.

20 2. On or about July 3, 2008, the Board of Registered Nursing received an  
21 application for Licensure by Endorsement from Sharon Bright. On or about July 1, 2008, Sharon  
22 Bright certified under penalty of perjury to the truthfulness of all statements, answers, and  
23 representations in the application. The Board denied the application on October 15, 2008.

24 JURISDICTION

25 3. This Statement of Issues is brought before the Board of Registered  
26 Nursing, under the authority of the following laws. All section references are to the Business and  
27 Professions Code unless otherwise indicated.

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1 of the Administrative Complaint, Stipulation and Final Order No. 2003-03252 are attached  
2 hereto as Exhibit "A" and incorporated herein by reference.

3 **SECOND CAUSE FOR DENIAL**

4 **(Dishonesty and False Statements)**

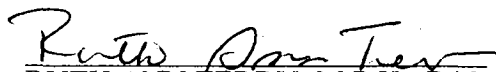
5 9. Respondent's application is subject to denial pursuant to Code section  
6 480, subdivision (a)(2) and subdivision (c), on the grounds of dishonesty and providing false  
7 statements on an application, in that on or about July 1, 2008, Respondent failed to disclose prior  
8 disciplinary proceedings against her Florida nurses's license on her Application for Licensure by  
9 Endorsement.

10 **PRAYER**

11 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
12 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 13 1. Denying Respondent's Application for Licensure by Endorsement to the  
14 Board of Registered Nursing; and  
15 2. Taking such other and further action as deemed necessary and proper.

16 DATED: 2/25/09.

17   
18 RUTH ANN TERRY, M.P.H., R.N.  
19 Executive Officer  
20 Board of Registered Nursing  
21 Department of Consumer Affairs  
22 State of California  
23 Complainant

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